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*Attorneys for Defendant and Counter-Claimant*  
**CHECKMATE.COM INC.**

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

ARJUN VASAN,

Plaintiff,

v.

CHECKMATE.COM, INC.,

Defendant.

CHECKMATE.COM, INC.,

Counterclaim-Plaintiff,

v.

ARJUN VASAN,

Counterclaim-  
Defendant.

Case No. 2:25-CV-00765-MEMF-JPR

Hon. Maame Ewusi-Mensah  
Frimpong

**DECLARATION OF REBECCA  
MAKITALO IN SUPPORT OF  
DEFENDANT  
CHECKMATE.COM, INC.'S  
OPPOSITION TO PLAINTIFF'S  
SECOND MOTION TO DISMISS  
COUNTERCLAIMS**

*[Filed concurrently with Defendant's  
Opposition to Plaintiff's Second  
Motion to Dismiss Counterclaims]*

Complaint Filed: January 28, 2025  
Amended Complaint Filed: February  
21, 2025

**DECLARATION OF REBECCA I. MAKITALO**

I, Rebecca I. Makitalo, declare as follows:

1. I am an attorney duly authorized to practice law before the courts of the State of California and this Court. I am an associate of the law firm of K&L Gates LLP, attorneys for Defendant Checkmate.com, Inc. (“Defendant” or “Checkmate”) in the above-captioned matter. I am counsel for Checkmate in this action. As such, I am familiar with the file in this matter, including the filings, discovery, correspondence, and evidence, all of which are maintained in the Firm’s records in the ordinary course of business. I have personal knowledge of the facts set forth herein and could and would testify competently thereto if called upon to do so.

2. In April 2024, Checkmate and Plaintiff Arjun Vasan (“Plaintiff” or “Vasan”) signed an Agreement and Plan of Merger (the “Merger Agreement”) as part of Defendant’s agreement to acquire VoiceBite, a company co-founded by Plaintiff. A true and correct copy of the Merger Agreement, as signed by Defendant and Plaintiff, is attached hereto as **Exhibit A**.

3. Concurrent with the completion of the Merger Agreement, Defendant and Plaintiff also entered into a Non-Competition Agreement (the “Non-Compete Agreement”). A true and correct copy of the Non-Compete Agreement, as signed by Defendant and Plaintiff, is attached hereto as **Exhibit B**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 18th day of September, 2025, in Los Angeles.



Rebecca I. Makitalo